

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

MUSTAFA ABDULLAH,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. 4:14-cv-1436 CDP
	)	
COUNTY OF SAINT LOUIS, MISSOURI,	)	
RONALD K. REPLOGLE, in his official	)	
capacity as Superintendent of the Missouri	)	
Highway Patrol, and JOHN DOES 1-5, in their	)	
individual capacities,	)	
	)	
Defendants.	)	
	)	

**MOTION TO AMEND PLAINTIFF'S WITNESS LIST**

Pursuant to Fed.R.Civ.P. 7 and Local Rule 04.01, Plaintiff hereby respectfully requests leave of the Court to add Johnetta Elzie to Plaintiff's list of witnesses filed with the Court on September 24, 2014.

There is good cause for Plaintiff's proposed addition. Ms. Elzie has witnessed recent enforcement of the rule that is the subject of this case. She is also knowledgeable about the status of protests in Ferguson. Her testimony is thus directly relevant to Defendants' claim that there is no longer a threat of irreparable injury.

Plaintiff's counsel first learned of Ms. Elzie and first interviewed her on the night of Saturday, September 27, 2014 (last night). Plaintiff has therefore acted diligently in seeking leave to add Ms. Elzie to his witness list.

DATED: September 28, 2014

Respectfully submitted,

/s/ Anthony E. Rothert

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**ATTORNEYS FOR PLAINTIFF**

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing was served upon each defendant by operation of the Court's ECF/CM system on September 28, 2014.

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*/s/ Anthony E. Rothert*